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Attorneys for Defendant
AFFORDABLE CARE, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BOSTON DENTAL GROUP, LLC, a Nevada
limited liability company,

Plaintiff,

vs.

AFFORDABLE CARE, LLC, a North
Carolina limited liability company,

Defendant.

Case No.: 2:16-cv-01636-RFB-CWH

**STIPULATION AND PROPOSED
ORDER TO EXTEND THE PRETRIAL
ORDER DEADLINE TWENTY-EIGHT
(28) DAYS TO JULY 12, 2018**

(THIRD REQUEST)

AND RELATED COUNTERCLAIM

1 Pursuant to LR IA 6-1 and 6-2, it is hereby agreed to and stipulated between
2 Plaintiff/Counterclaim Defendant Boston Dental Group, LLC ("Boston Dental"), by and
3 through its counsel, Michael R. Mushkin & Associates P.C. and Borghese Legal, Ltd., on the
4 one hand, and Defendant/Counterclaim Plaintiff Affordable Care, LLC ("Affordable Care"),
5 by and through its counsel, Kolesar & Leatham and Barack Ferrazzano Kirschbaum &
6 Nagelberg LLP, on the other hand, to a twenty-eight (28) day extension of the June 14, 2018
7 Joint Pretrial Order deadline, until July 12, 2018, for the purpose of allowing the parties to
8 finalize a settlement agreement in principle, as further set forth herein. This is the third
9 stipulation for extension of time to extend the Joint Pretrial Order deadline.

10 On May 18, 2018, this Court extended the Pretrial Order deadline to June 14, 2018 to
11 allow the parties time to finalize a settlement agreement in principle. Since that time, the
12 parties have been working to finalize the settlement agreement, and are optimistic that
13 settlement negotiations will be concluded shortly. The parties now seek a brief twenty-eight
14 (28) day extension of the Joint Pretrial Order deadline in order to finalize and execute the
15 settlement agreement. The litigation of this matter will be best served by the proposed
16 extension. There is good cause to grant the parties' third stipulation for extension of time
17 because the parties only seek the extension to allow time to finalize the settlement in
18 principle. *See Fernandez v. N.V.*, Case No. 2011 WL 3957612 at *2 (Dist. Nev. Sept. 6,
19 2011) (granting motion for extension of time to file pretrial brief because parties engaged in
20 settlement negotiations).

21 Accordingly, the parties stipulate that the deadline for the Joint Pretrial Order be
22 extended for twenty-eight (28) days from June 14, 2018 to July 12, 2018.

23
24 **IT IS SO STIPULATED.**

25 DATED this 14th day of June, 2018

DATED this 14th day of June, 2018

KOLESAR & LEATHAM

BORGHESE LEGAL, LTD.

By /s/ Sharon E. Calhoun

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Boston Dental Group, LLC

ORDER

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
United States District Court

DATED: June 15, 2018.